

# EXHIBIT B

## DEPOSITION BREAKDOWN

Deposition transcripts used in **Post-Judgment Motions** filed after the submission of the Bill of Costs:

1. Deposition of Natalie Reeser – used in Plaintiff's Response to Defendant's Motion for Judgment filed July 12, 2016, pg. 11 (attached)

Deposition transcripts necessarily obtained for use in the case under 28 U.S.C. §1920(2) to support motions, examination of witnesses, the scope of discovery, and argument at trial. See *MacDonald v. United Parcel Serv.*, No. 07-12022, 2010 WL 1254607 (E.D. Mich. Mar. 26, 2010) (attached)

1. Deposition of Natalie Reeser
2. Deposition of Jill Hood
3. Deposition of Martha Wiseheart
4. Deposition of Fiona Bork

Deposition transcripts used for impeachment at trial:

1. Deposition of Jill Hood – read into the record on or about May 12, 2016
2. Deposition of Fiona Bork - read into the record on or about May 11, 2016 and May 12, 2016

Deposition transcripts used in motions:

1. Deposition of Natalie Reeser – used in Plaintiff's Response to Defendant's Motion for Summary Judgment filed June 10, 2015 – pg. 1, 2, 3, 6, 7, 9, 10, 11, 14, 17, 24, 25
2. Deposition of Jill Hood - used in Plaintiff's Response to Defendant's Motion for Summary Judgment filed June 10, 2015 – pg. 4, 5, 6, 7, 8, 11, 12, 13, 17, 18, 19, 20, 22, 23, 25
3. Deposition of Martha Wiseheart filed June 10, 2015 – used in Plaintiff's Response to Defendant's Motion for Summary Judgment – pg. 1, 2, 3, 14, 20, 21
4. Deposition of Fiona Bork filed June 10, 2015 - used in Plaintiff's Response to Defendant's Motion for Summary Judgment – pg. 2, 12, 20, 21, 22

Costs for Natalie Reeser

<u>Delivery</u>	<u>Date</u>	<u>Cost</u>	<u>Description</u>
	7/22/2015	<u>\$80.00</u>	Area Delivery to Spectrum Computer Forensics
Total		\$80.00	
<u>Fees of Service of Summons and Subpoena</u>			
	5/19/2014	\$35.00	Serve Summons & Complaint/Return POS Detroit
	5/19/2014	\$60.00	Serve Summons & Complaint/Return POS (Novi)
	6/10/2014	\$275.00	Serve Summons and Complaint/Return POS Detroit
	12/29/2015	\$60.00	Process Service on Chanda Gibson
	12/15/2015	\$60.00	Process Service Henry Ford Health System
	4/28/2016	\$19.84	Process Service to Desire Miller
	12/15/2015	\$25.00	Process Service Henry Ford Health System
	4/28/2016	<u>\$20.00</u>	Process Service Henry Ford Hospital
Total		\$554.84	
<u>Computerized Research</u>			
	5/19/2014	\$58.32	Computerized Research for the Month of May
	7/9/2014	\$167.17	Computerized Research for the Month of June
	7/31/2014	\$24.76	Computerized Research for the Month of July
	10/21/2014	\$11.08	Computerized Research for the Month of August
	11/24/2014	\$9.87	Computerized Research for the Month of September
	12/22/2014	\$227.98	Computerized Research for the Month of November
	2/24/2015	\$36.81	Computerized Research for the Month of February
	3/13/2015	\$77.49	Computerized Research for the Month of March
	4/22/2015	\$370.51	Computerized Research for the Month of April
	6/30/2015	\$55.91	Computerized Research for the Month of May
	7/31/2015	\$597.97	Computerized Research for the Month of June
	8/30/2015	\$746.77	Computerized Research for the Month of July
	10/27/2015	\$174.91	Computerized Research for the Month of October
	12/23/2015	\$870.53	Computerized Research for the Month of December
	2/29/2016	\$23.43	Computerized Research for the Month of February
	3/31/2016	\$744.75	Computerized Research for the Month of March

Costs for Natalie Reeser

<u>Total</u>	4/12/2016	<u>\$779.58</u> Computerized Research for the Month of April	
		\$4,977.84	
<u>Filing Fees</u>	6/18/2014	<u>\$400.00</u> Complaint and Demand for Jury Trial	
		\$400.00	
<u>Court Reporter</u>	3/24/2015	\$2,036.00 Transcript of the Deposition of Fiona Bork on March 16/2015	
	4/8/2015	\$79.50 Natalie Reeser Deposition	
	4/22/2015	\$773.75 Natalie Reeser Deposition	
	5/14/2015	\$1,275.00 Transcript of the Deposition of Jill Hood	
	4/27/2016	<u>\$82.80</u> Transcript of motion hearing held on April 21, 2016	
<u>Total</u>		\$4,247.05	
<u>Witness Fees</u>		<u>Name and address</u>	
	3/4/2015	\$42.85 Jill Hood, C/O Varnum LLP, 39500 High Pointe Blvd. Suite 350, Novi, MI 48375	
	2/20/2015	\$58.75 Natalie Reeser, 9801 Merideth Grade, Harrison, MI 48625	
	11/24/2015	\$19.84 Desirie Miller, 32836 Kathleen Drive, Chesterfield Township, MI 48047	
	11/19/2015	\$7.07 Chanda Gibson, 16242 Carlisle Street, Detroit, MI 48205	
	4/12/2016	\$102.06 Debra Reeser, 1853 Muskegon, St. Helen, MI 48656	
	4/12/2016	\$19.84 Desirie Miller, 32836 Kathleen Drive, Chesterfield Township, MI 48047	
	4/14/2016	\$3.92 Henry Ford Health System, Detroit, MI	
	4/12/2016	<u>\$24.50</u> Jill Hood, C/O Terry Miglio 160 W. Fort Street, 5th Floor, Detroit, MI 48226	
<u>Total</u>		\$278.83	
<u>Document Production/Copies</u>			
	1/8/2015	\$30.50 Document Production from Varnum LLP	
	3/1/2015	\$189.75 Human Resource Records from Various Employers, Michigan Legal Copy LLC	
	6/23/2015	\$318.00 Human Resource Records from Various Employers, Michigan Legal Copy LLC	
	2/26/2016	\$92.00 Quest Diagnostics, Michigan Legal Copy LLC	
	4/22/2015	\$33.00 Personnel Records from Ledin Home Health Care	
	4/29/2015	<u>\$63.25</u> Cell phone records	
		\$726.50	